The ARRL streamlined licensing proposal addressed in **RM-10867**, seems sound and should allow for current and future licensees to enjoy HF privileges without the burden of a Morse code examination. The proposed changes are consistent with Article 25 of the international *Radio Regulations* at World Radiocommunication Conference 2003 (WRC-03), and with the changes made to licensing procedures in most of the CEPT nations, as well as Australia and New Zealand. The proposed changes will undoubtedly bring growth to the amateur radio community through the elimination of Morse code testing for all but Amateur Extra Class operators. Of note, however, is a problem with the proposed automatic upgrade of current Novice and Technician Class licensees to General Class.

Prior to April 15, 2000, the licensing process allowed for a total of six different license types: Novice, Technician, Technician Plus, General, Advanced, and Amateur Extra. To acquire a Novice license, the applicant was required to pass a 5 wpm Morse code exam (element one at that time) and a 35 question multiple choice test (element 4) that covered HF operating procedures, band plans, Commission's rules, etc. The novice license allowed CW operation on three HF bands; CW, data, and voice operation on a portion of 10 meters; and power restricted operation on 220 MHz and 1.2 GHz.

To attain a Technician license, the applicant was required to pass element 4, the novice written exam, as well as element 5, a written exam covering VHF/UHF operations. The Technician license provided privileges on all VHF and higher ham bands, but did not allow HF operation as the licensee had not received credit for element one. Technicians that had also passed the element one Morse code exam (Technician Plus) were allowed the same HF privileges that novice licensees enjoyed in addition to their Technician class privileges.

On April 15, 2000, the licensing structure was streamlined (*Report and Order* (WT 98-143)) to the current system that provides for the issuance of only three license types: Technician, General, and Amateur Extra (holders of phased out licenses are allowed to renew indefinitely, but no new Novice, Technician Plus, or Advanced licenses are issued; no licensees were granted automatic upgrades). To obtain a Technician license, a current examinee needs to pass a 35 question multiple choice examination covering VHF/UHF operating practices, band plans, Commission's rules, etc. Because the current Technician class license does not allow HF operation, the examination is geared mainly toward VHF/UHF operation. While the question pool contains a few questions regarding 10 meter operation and HF propagation, they don't necessarily appear on every exam; thus, only VHF/UHF operations are covered with any certainty. The questions regarding introductory HF principles that were formerly on the Novice exam were, in essence, added to the current element three (General Class written) exam, not to the element two Technician test.

Because Technician class licensee that obtained their licenses after April 15, 2000, have not passed an examination that covers HF operation in anything more than a cursory manner, it would be inappropriate to upgrade them to General Class licensees under the proposed license restructuring. These automatic upgrades are also inconsistent with the proposed requirement that new General Class licensees be required to take the current

element three General Class examination, a much more difficult test than the current element two examination. It would be more appropriate to grant General Class upgrades only to current Technician Class licensees that obtained their licenses prior to April 15, 2000, as these licensees have passed an examination covering HF as well as VHF/UHF operations. Technician Class licensees that obtained their licenses after April 15, 2000, and current holders of Novice licenses should both have only the privileges of the entry class licensee, called "novice" in the proposed license restructuring. Element three exam credit covering HF operations should be required for these licensees to upgrade to General class.

These "paper upgrades," as they are frequently called, of only certain licensees within a license class may seem confusing to implement, but could easily be handled through the volunteer examiner (VE) program. Current Technician Plus licensees that can show they had a technician license prior to March 21, 1989 are given credit for elements one, two, and three (an upgrade to General Class) at VE sessions. Persons with expired Technician licenses issued prior to March 21, 1989 are given credit for elements one and two. Similar procedures could be easily be put in place for Technicians licensed prior to April 15, 2000.